

Bridgeton Landfill, LLC
13570 St. Charles Rock Road
Bridgeton, MO 63044

January 29, 2008

Ms. Kathrina M. Donegan
Air Pollution Control Program
St. Louis County Health
111 South Meramec Avenue
Clayton, Missouri 63105

REC'D.
JAN 31 2008
APCO

**Re: Annual Compliance Certification, Semi-Annual NSPS and NESHAP Reports
Bridgeton Landfill, LLC, 189-0312**

Dear Ms. Donegan:

On behalf of Bridgeton Landfill, LLC, enclosed are the Semi-Annual Report for the Title V Operating Permit (OP2001009), the Semi-Annual Report in accordance with New Source Performance Standards for Municipal Solid Waste Landfills 40 CFR 60 Subpart WWW (NSPS) and the Semi-Annual Report Startup, Shutdown and Malfunction (SSM) Plan per National Emissions Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills, being 40 CFR Part 63 Subpart AAAA (NESHAP). The enclosed reports serve as the 2007 Title V Annual Compliance Certification, the Semi-Annual NSPS Report and the SSM Report for the period July 1, 2007 through December 31, 2007.

I certify based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

If you have any questions, please contact Allen Steinkamp of Bridgeton Landfill at (314) 739-5099 or Michele Boussad of Aquaterra Environmental Solutions at (573) 442-6391.

Sincerely,

ALLIED WASTE SERVICES



Tony Rosback
District Manager

C: Mr. Bob Randolph, MDNR-APCP, Ms. Patricia Scott, EPA Region VII
Allen Steinkamp, Environmental Manager, Bridgeton Landfill, LLC,
Rick Walker, Site Manager, Bridgeton Landfill, LLC

January 30, 2008

Ms. Kathrina M. Donegan
Air Pollution Control Program
St. Louis County Health
111 South Meramec Avenue
Clayton, Missouri 63105

**Re: Semi-Annual Startup, Shutdown and Malfunction (SSM) Report
2007 Semi-Annual Report
Bridgeton Landfill, LLC 189-0312
Air Operating Permit Number OP2001009
Reporting Period: July 1, 2007 through December 31, 2007**

Dear Ms. Donegan:

The Bridgeton Landfill, LLC is subject to the National Emissions Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills, being 40 CFR Part 63 Subparts A and AAAA (NESHAP). The NESHAP requires a facility to prepare and implement a start-up, shutdown and malfunction (SSM) Plan. The SSM Plan includes the procedures for operating and maintaining affected landfill gas (LFG) collection and control equipment as well as continuous control device monitoring equipment during start-up, shutdown and malfunction events. The Bridgeton Landfill, LLC is an existing source and implemented the SSM Plan on January 16, 2003.

In accordance with 40 CFR §63.10(d)(5), a semi-annual report must be submitted to the regulatory authority within 30 days of the completion of the calendar half. The report shall contain information pertaining to the facility's compliance with the procedures in their SSM Plan during SSM events. This letter serves as the Semi-Annual SSM Report for the reporting period July 1, 2007 through December 31, 2007.

During the period of July 1, 2007 through December 31, 2007, the Bridgeton Landfill documented forty-four (44) SSM events in accordance with the Startup, Shutdown and Malfunction Plan developed for the facility and to comply with 40 CFR 63 Subpart AAAA. During this compliance period no deviations from the SSM Plan were recorded, therefore no revisions to the SSM Plan have been required.

For the reporting period, twenty-two (22) start-up and four (4) shutdown events occurred. The actions taken at the facility for all SSM events during the reporting period July 1, 2007 through December 31, 2007 were consistent with the procedures listed in the SSM Plan at

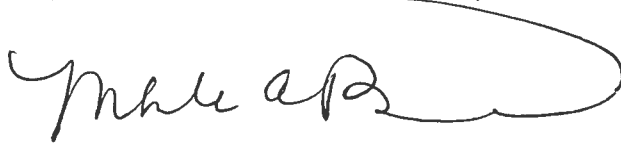
Bridgeton Landfill, LLC
Semi-Annual Startup, Shutdown and Malfunction (SSM) Report
2006 Semi-Annual Report: July 1, 2007 through December 31, 2007
January 30, 2008

the facility. Records of SSM events are maintained at the facility and are available for review.

During the reporting period, eighteen (18) malfunction events occurred, of which none caused an applicable limitation to be exceeded. Table 1 contains the date, duration and description of all malfunction events for the reporting period.

Attached is certification by the Responsible Official. If you have any questions regarding this Semi-Annual SSM Report, please contact me at (573) 442-6391.

Sincerely,
Aquaterra Environmental Solutions, Inc.

A handwritten signature in black ink, appearing to read "Michele A. Boussad", with a large, sweeping loop at the end.

Michele A. Boussad
Senior Project Manager

Attachment: Table 1 - Description of Malfunction Events

c: Mr. Bob Randolph, MDNR-APCP
Mr. Patricia Scott, EPA Region VII
Allen Steinkamp, Allied Waste Services
Niki Wuestenberg, Allied Waste Services
Rick Walker, Bridgeton Landfill, LLC

Bridgeton Landfill, LLC
Table 1
Malfunction Events
July 1, 2007 - December 31, 2007

Date(s) of Event	Duration of Event (hours:min)	Equipment Affected*	Description of Malfunction	Were SSM Plan Procedures Followed	Emission Limit Exceeded or Potentially Exceeded**
07/09/07	11:30	Control Device	Loss of Power	Yes	No
07/19/07	16:15	Control Device	Loss of Power	Yes	No
07/27/07	1:50	CMS	Continuous Monitoring System Malfunction - Paper chart failed to record data	Yes	No
08/24/07	0:25	Control Device	Loss of Power - Utility Down	Yes	No
08/24/07	22:35	Control Device	Unalarmed Shutdown	Yes	No
08/28/07	22:35	CMS	Continuous Monitoring System Malfunction - Paper chart failed to record data	Yes	No
08/29/07	0:35	CMS	Continuous Monitoring System Malfunction - Paper chart not in-place due to strong winds	Yes	No
09/04/07	13:03	Control Device	Maintenance	Yes	No
09/04/07	0:30	Control Device	Automatic shutdown of control device by designed protective systems (high temp)	Yes	No
09/06/07	1:40	Control Device	Loss of power - utility down	Yes	No
09/12/07	7:30	CMS	Continuous Monitoring System Malfunction - Flow Monitor	Yes	No
09/21/07	63:52	CMS	Continuous Monitoring System Malfunction - Flow Monitor	Yes	No
10/09/07	3:00	CMS	Continuous Monitoring System Malfunction - Flow Monitor	Yes	No
10/25/07	38:00	Control Device	Loss of power - utility down	Yes	No
10/29/07	1:12	Control Device	Automatic shutdown of control device by designed protective systems (loss of pressure)	Yes	No
10/26/07	63:22	CMS	Continuous Monitoring System Malfunction - Flow Monitor (illegible data)	Yes	No
11/06/07	0:58	Control Device	Loss of power - utility down	Yes	No
12/19/07	12:06	Control Device	Loss of power (loss of phase)	Yes	No

* Control Device, Continuous Monitoring System, or Collection System

**If the Malfunction Event caused or may have caused an emission limitation to be exceeded (i.e., raw LFG released to air) then enter YES.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 1 - INSTALLATION INFORMATION AND CERTIFICATION

FIPS NO.	189	PLANT NO.	0312
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INSTALLATION NAME
BRIDGETON LANDFILL, LLC

INSTALLATION LOCATION (STREET ADDRESS AND CITY)
13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044

OPERATING PERMIT NUMBER OP2001009 (RENEWAL APPLICATION SUBMITTED 8/6/04)	DATE OPERATING PERMIT ISSUED 2/7/01
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TYPE OF REPORT

☒ ANNUAL COMPLIANCE CERTIFICATION ☐ SEMI-ANNUAL MONITORING REPORT ☐ EXCEEDANCE REPORT

IF ANNUAL COMPLIANCE CERTIFICATION, IS THE ANNUAL COMPLIANCE CERTIFICATION BEING SUBMITTED TO ALSO FULFILL THE REPORTING REQUIREMENTS FOR THE SEMI-ANNUAL MONITORING REPORT?

☐ YES ☐ NO

REPORTING PERIOD START DATE 01/01/07	REPORTING PERIOD END DATE 12/31/07
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	RESPONSIBLE OFFICIAL	PERMIT CONTACT PERSON
Name	TONY ROSBACK	ALLEN STEINKAMP
Title	DISTRICT MANAGER	ENVIRONMENTAL MANAGER
Mailing Address	13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044	13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044
Telephone Number	(314)739-5099	(314) 739-5099

HAS THE ABOVE INFORMATION CHANGED SINCE THE ISSUANCE OF THE OPERATING PERMIT?

☒ YES ☐ NO

CERTIFICATION STATEMENT

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.*

SIGNATURE OF RESPONSIBLE OFFICIAL 	DATE SIGNED 1/29/2008
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PRINT NAME OF RESPONSIBLE OFFICIAL
TONY ROSBACK

*This certification means that the signatory has verified compliance with all applicable regulations and operating permit conditions, and that the installation has complied with all monitoring, record keeping, reporting and testing conditions specified in the operating permit unless specified differently in a deviations report. For information concerning administrative and civil penalties, please consult Section 643.085 of the Revised Statutes of the State of Missouri (RSMo) and Section 643.151 RSMo, respectively.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 2

FIPS NO.

189

PLANT NO.

0312

INSTALLATION NAME

BRIDGETON LANDFILL, LLC

REPORTING PERIOD

01/01/07-12/31/07

1. PLANT-WIDE PERMIT CONDITIONS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE PLANT-WIDE PERMIT CONDITIONS?

☒ YES ☐ NO

2. EMISSION UNIT PERMIT CONDITIONS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE EMISSION UNIT PERMIT CONDITIONS?

☐ YES ☒ NO

3. CORE PERMIT REQUIREMENTS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE CORE PERMIT REQUIREMENTS?

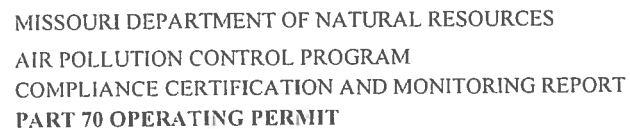
☐ YES ☒ NO

4. GENERAL PERMIT REQUIREMENTS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE GENERAL PERMIT REQUIREMENTS?

☐ YES ☒ NO

NOTE: If you checked "Yes" in any of the four deviation questions above, and the installation has not previously reported the deviations, the installation must complete Part 3 of the Compliance Certification and Monitoring Report Form.



FIPS NO. 189	PLANT NO. 0312	INSTALLATION NAME BRIDGETON LANDFILL, LLC
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PLANT NO. 0312

INSTALLATION NAME BRIDGETON LANDFILL, LLC

REPORT PERIOD END DATE	12/31/07
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POLLUTANT

**MONITORED
LEVEL**

MONITORING METHOD

DEVIATION DESCRIPTION

DEVIATION DATE

DEVIATION DURATION

CAUSE OF DEVIATION

CORRECTIVE ACTION

SEE 1/1/07 - 6/30/07 EG & MACT REPORTS AND 7/1/07 - 12/31/07 EG & MACT REPORTS



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 4

FIPS NO. 189	PLANT NO. 0312
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INSTALLATION NAME
BRIDGETON LANDFILL, LLC

REPORTING PERIOD
01/01/07 - 12/31/07

WERE THERE ANY OTHER MONITORING DEVIATION (EXCESS EMISSION) REPORTS SUBMITTED TO THE MISSOURI DEPARTMENT OF NATURAL RESOURCES- AIR POLLUTION CONTROL PROGRAM DURING THIS REPORTING PERIOD?

☒ YES ☐ NO (IF YES, SUBMIT A COPY OF THE REPORT OR COMPLETE THE DEVIATION REPORT SUMMARY BELOW)

PERMIT CONDITION	REPORTING REQUIREMENT	DATE REPORT SUBMITTED TO THE DEPARTMENT
SEE ATTACHED EG AND MACT REPORTS		
PW006 Reporting Condition 7	Submit EG semiannual report of records; report includes deviations from 10 CSR 10-5.490	7/30/07 (Reporting period 1/1/07 - 6/30/07) 1/30/08 (Reporting period 7/1/07 - 12/31/07)
	Submit SSM events in accordance with site's SSM Plan; report includes SSM events	7/30/07 (Reporting period 1/1/07 - 6/30/07) 1/30/08 (Reporting period 7/1/07 - 12/31/07)
General Permit Condition 1.(II)(A)(1)	Submit Title V Semi Annual Report	7/30/07 (Reporting period 1/1/07-6/30/07) 1/30/08 (Reporting period 7/1/07 - 12/31/07)

INSTALLATION NAME

BRIDGETON LANDFILL, LLC

REPORTING PERIOD

01/01/07 - 12/31/07

WERE THERE ANY OTHER MONITORING DEVIATION (EXCESS EMISSION) REPORTS SUBMITTED TO THE MISSOURI DEPARTMENT OF NATURAL RESOURCES- AIR POLLUTION CONTROL PROGRAM DURING THIS REPORTING PERIOD?

☒ YES ☐ NO (IF YES, SUBMIT A COPY OF THE REPORT OR COMPLETE THE DEVIATION REPORT SUMMARY BELOW)

PERMIT CONDITION	REPORTING REQUIREMENT	DATE REPORT SUBMITTED TO THE DEPARTMENT
General Permit Condition 1.(V)(II)(D)		<p>Exceedance Reports for the following reporting periods:</p> <p>Reporting period 12/1/06 - 1/31/07;</p> <p>Reporting period 1/12/07 - 1/17/07;</p> <p>Reporting period 3/12/07 - 3/15/07;</p> <p>Reporting period 3/12/07 - 4/4/07;</p> <p>Reporting period 1/1/07 - 4/12/07;</p> <p>Reporting period 7/10/07 - 7/13/07;</p> <p>Reporting period 7/10/07 - 7/23/07;</p> <p>Reporting period 7/19/07 - 7/20/07;</p> <p>Reporting period 7/23/07 - 7/27/07;</p> <p>Reporting period 7/28/07 - 8/25/07;</p> <p>Reporting period 8/28/07 - 8/29/07;</p> <p>Reporting period 8/29/07 - 9/4/07;</p> <p>Reporting period 8/29/07 - 9/6/07;</p> <p>Reporting period 9/4/07 - 9/7/07;</p> <p>Reporting period 9/6/07 - 9/6/07;</p> <p>Reporting period 9/12/07 - 9/12/07;</p> <p>Reporting period 9/21/07 - 9/24/07;</p> <p>Reporting period 10/4/07 - 10/24/07;</p> <p>Reporting period 10/9/07 - 10/9/07;</p> <p>Reporting period 10/25/07 - 10/29/07;</p> <p>Reporting period 11/1/07 - 11/2/07;</p> <p>Reporting period 11/1/07 - 11/12/07;</p> <p>Reporting period 11/6/07 - 11/6/07;</p> <p>Reporting period 11/12/07 - 12/27/07;</p> <p>Reporting period 12/19/07 - 12/19/07;</p> <p>Reporting period 11/12/07 - 1/4/08</p>